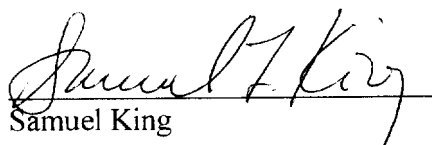I declare, under penalty of perjury, that the foregoing is true and correct. Executed on

October 17, 1997.

Samuel King

ATTACHMENT 1

MCI Telecommunications Corporation

780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

MCI

August 5, 1997

Ms. Ilene Barnett
BellSouth Interconnection
1960 west Exchange Place Ste. 420
Tucker, GA 30084

Ilene,

This letter is in response to our meeting on July 2 at which MCI requested to establish a Joint Implementation Team (JIT) with BST to begin the development of a Pre-Ordering interface using the OBF agreed interim TCP/IP SSL3 protocol.

The agreement at that meeting was that BST would provide a response to MCI on regarding our request by July 14th. I received a call from Linda Tate during the week of July 21st stating that she was still researching our request.

MCI is interested in pursuing this development effort but is constrained by BST's lack of response. Please provide your position on establishing a JIT to begin the development of a Pre-Ordering interface using TCP/IP SSL3 by Monday, August 11th.

Thanks in advance for your immediate attention to this matter.

Bryan Green
Sr. Manager
Systems Implementation
404-267-5515

**MCI Telecommunications
Corporation**

MCI

780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

August 22, 1997

Mr. Cliff Bowers
BellSouth Interconnection
1960 west Exchange Place Ste. 420
Tucker, GA 30084

Cliff,

We are still waiting for a response to our request for establishing a Joint
Implementation Team (JIT) to begin development of a Pre-Ordering interface
using the OBF agreed interim TCP/IP SSL3 protocol. The original response was
due on the 14th of July with a second request made on August 5th.

I would appreciate a response to our request within the week. Our specifications
were shared with Linda Tate on July 14th titled Pre-Order Generic Interface
Requirements Specifications Draft Version 3. If BST/is not in a position to begin
development of the agreed interim protocol, please respond accordingly.

As stated before, MCI is interested in pursuing this development effort but is
constrained by BST's lack of response. Thanks in advance for your immediate
attention to this matter.

Bryan Green
Sr. Manager
Systems Implementation
404-267-5515

ATTACHMENT 2

September 16, 1997

Mr. Bryan Green
MCI Telecommunications Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, Georgia 30342

Dear Bryan,

In your August 5, 1997, letter, you requested that BellSouth establish a Joint
Implementation Team (JIT) with MCI to begin the development of a pre-ordering
interface using the TCP/IP SSL3 protocol. It is BellSouth's understanding that the
("PreOrdering/Ordering") EDI Over SSL3/TCP/IP is under discussion by the Electronic
Communications Implementation Committee [ECIC], and an official ECIC technical
implementation guideline for use as an industry standard is not available at this time.

At the September, 1997, ECIC meeting in Kansas City, MO, the Local Ordering
subcommittee began discussion of the implementation issues for SSL3/TCP/IP. MCI
was in attendance at the meeting and on September 8, 1997, MCI submitted a draft
proposal of the implementation flow for discussion in the ECIC. With respect to that
proposal, a number of issues were raised. Action items were assigned by the
committee to create the implementation guidelines. Pending resolution of the
technical issues, the implementation guidelines may be published as early as
December, 1997. BellSouth will be glad to discuss the establishment of a JIT with
MCI once the ECIC guidelines are available.

Sincerely,

Cliff Bowers

ATTACHMENT 3

May 16, 1997

Ms. Ilene Barnett
BellSouth
1960 west Exchange Place Ste. 420
Tucker, GA 30084

Ilene,

I have recently had an opportunity to review the LENS material BST provided MCI on 5/12//97.
While going through the material, I noticed that the USER guide was the only documentation
provided. Two vital pieces of information are still missing: documentation on how to connect to
LENS (i.e. the steps necessary and the forms required to physically gain connectivity to LENS)
and the technical specifications that would allow MCI to build an interface to LENS.

These documents are necessary for MCI to complete its assessment of LENS. Please provide
me with an idea of when I can expect to receive these documents.

/

I will follow this email up with a letter addressed to you.

Bryan Green
Sr. Manager
Systems Implementation
404-267-5515

MCI

780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

June 4, 1997

Ms. Ilene Barnett
BellSouth
1960 west Exchange Place Ste. 420
Tucker, GA 30084

Ilene,

I recently received a certified letter from you stating that MCI was working with BST to pursue the technical specifications that would allow MCI to build an interface to LENS. Per our conversation this afternoon, this is not correct. The discussions underway between MCI and BST are to facilitate the provisioning of connection between our gateways to allow MCI to access LENS via our LAN.

Since writing the original request on May 16, 1997, I have not received a response or any status on the availability of the documentation. Again, the longer the delay on receiving this information the greater the impact on our ability to develop the interfaces in a timely manner.

We are awaiting your response on this matter.

Bryan Green
Sr. Manager
Systems Implementation
404-267-5515

MCI Telecommunications Corporation

780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

June 26, 1997

Ms. Ilene Barnett
BellSouth Interconnection
1960 West Exchange Place Ste. 420
Tucker, GA 30084

Ilene,

This letter is to request status of the LENS technical specifications that MCI requested in writing on May 16, 1997.

Based on the lack of response from BST on this issue, we will assume that the technical specifications are not available. The lack of technical specifications has caused MCI significant delay with respect to interface development.

Please provide status on the LENS technical specifications by Wednesday, July 2, 1997. Your prompt response to this matter will be greatly appreciated.

Bryan Green
Sr. Manager
Systems Implementation
404-267-5515

cc: Pam Lee
         Marcel Henry
         Georjean Simmons

ATTACHMENT 4

Rec'd 7/5/97

BellSouth Interconnection Services   Memorandum

File Code

Date   July 8, 1997

To   Bryan Green
Telephone number   404-267-5515
Fax number

From   Ilene Barnett
Telephone number   770-492-7525
Fax number

Subject   LENS Access Technical Specification

Enclosed is the document you requested beginning on May 16, 1997. This document was provided to me with the caveat that it had not been updated to match the current LENS application. I will work with Linda Tate to provide you an updated copy as soon as it is available.

I apologize for the length of time in responding to your request. Please don't hesitate to call me if you have additional questions or would like to have more discussions on this subject.

cc: Linda Tate (w/o attachment)
     Don Stewart (w/o attachment)

ATTACHMENT 5

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

- - - - - - - - - - - - - - - - - - - -

                                :

In the Matter of: :

                                :

CONSIDERATION OF BELLSOUTH   :   Docket No. 6863-U
TELECOMMUNICATIONS, INC.'S SERVICES :
PURSUANT TO SECTION 271 OF THE   :
TELECOMMUNICATIONS ACT OF 1996   :

                                :

- - - - - - - - - - - - - - - - - - - -

                                Room 177
                                244 Washington Street
                                Atlanta, Georgia

                                Monday, July 14, 1997

      The above-entitled matter came on for hearing

pursuant to adjournment at 10:00 a.m.

BEFORE:

              ROBERT BAKER, Vice Chairman
              MAC BARBER, Commissioner
              DAVID BAKER, Commissioner
              ROBERT DURDEN, Commissioner

                         * * *

1   systems to determine whether the systems met the business

2   requirements provided to the systems developers.

3 Q. Has BellSouth undertaken additional testing to determine the capacity

4   of its systems?

5

6 A. Yes. BellSouth has conducted volume testing, also known as load

7   testing.

8

9 Q. Based on that testing, what is the capacity of BellSouth's EDI and

10   LENS ordering systems?

11

12 A. The combined capacity of these systems, including the mechanized

13   order generation capability in LESOG, has been verified as being at

14   least 5000 local service requests per day, which is the capacity for

15   which these systems initially were designed. These volumes are

16   depicted on Exhibit GC-26.

17

18 Q. On what basis were the systems sized?

19

20 A. BellSouth has sized the initial capacity on the basis of BellSouth

21   forecast information for 1997, incorporating CLEC forecast information,

22   where available. For effective system capacity management, it is

23   essential that CLECs cooperate in providing appropriate forecast

24   information that can be used to estimate their system usage.

25

1   of being ordered, you'd have to pick up a paper manual to

2   get a list of those services?

3   A   That's correct.

4   Q   Specifically for ordering, which interface is

5   BellSouth relying on in asserting that it is providing non-

6   discriminatory access to its operational support systems?

7   A   Specifically for ordering, it would be the EDI

8   ordering interface which is the primary ordering interface

9   recommended by the industry for CLEC ordering as well as the

10   EXACT interface which is the existing industry standard

11   interface that supports things like interconnection trunking

12   and some more infrastructure type unbundled network

13   elements.

14   Q   So you agree then that LENS does not provide

15   nondiscriminatory access to ordering functions?

16   A   I don't know that I agree with that, I haven't

17   really thought about that. I just think what I said was

18   that's not the one we're relying on.

19   Q   Do you assert that LENS does provide

20   nondiscriminatory access to ordering functions?

21   A   I think I would have to spend some time looking at

22   that question specifically. In my mind, the industry

23   standard EDI ordering interface, is the primary ordering

24   interface.

25   Q   Just so I'm clear in this proceeding, it's EDI and

1   Q   And DOE, D-O-E, is the -- serves the pre-ordering

2   and ordering functions for business services, is that

3   correct?

4   A   For some business services.

5   Q   The business services that cannot be served using

6   RNS?

7   A   No, that's not quite correct. To be real specific

8   about it, RNS is for most resident services. Some resident

9   services that are not supported by RNS are done in DOE. DOE

10   does some business services but not all. There are many

11   complex business services that the pre-ordering functions

12   and the ordering functions are handled on a manual basis,

13   even for BellSouth's retail customers.

14   Q   Okay.

15   COMMISSIONER D. BAKER: I'm sorry, Ms. Calhoun,

16   give me RNS again?

17   THE WITNESS: The regional negotiation system.

18   COMMISSIONER D. BAKER: Thank you.

19   BY MR. LAMOUREAUX:

20   Q   But both RNS and DOE are integrated ordering and

21   pre-ordering systems, correct?

22   A   For the most part.

23   Q   So the systems that BellSouth has set up for

24   CLECs, for the combination of pre-ordering and ordering

25   functions differently than the system BellSouth has for the

1 combination of pre-ordering and ordering, correct?

2   A   That's correct. The EDI ordering interface began

3 to be established in advance of a pre-ordering interface,

4 and even now the industry hasn't settled on a standard for

5 pre-ordering. The industry prioritized ordering way ahead

6 of pre-ordering, and so that work is starting to come along

7 now.

8   Q   But as of today, BellSouth has single integrated

9 pre-ordering and ordering capabilities for both business and

10 res, but CLECs have two separate systems that they have to

11 use for ordering and pre-ordering?

12   A   Well, I would disagree with your characterization

13 that they have to use it. Again, there are ways that the

14 systems can be integrated on the CLEC side of the interface,

15 if they choose to do that.

16   Q   Are you aware of any system that's currently being

17 developed -- that has been developed -- to integrate EDI and

18 LENS in terms of ordering and pre-ordering information?

19   A   No.

20   Q   Now as I read your testimony, you agree with

21 paragraph 312 of the FCC Order as to the general standard in

22 providing access to unbundled network elements, including

23 OSS, is that correct?

24   A   Could you give me a reference in my testimony,

25 please?

1   and the system would have remembered the address for the

2   telephone number I was trying to select. So it would have

3   been carried forward in the inquiry mode and it would be

4   carried forward in the firm order mode, but not from one to

5   the other.

6   Q   But the way you have the slides put together here,

7   going from inquiry mode to firm order mode, your statement

8   that LENS would have remembered this information when you

9   got to selecting telephone numbers is not correct?

10   A   That's correct.

11   MR. LAMOUREUX: I can turn the projector off now.

12   CHAIRMAN WISE: Thank you, sir.

13   BY MR. LAMOUREUX:

14   Q   It does not communicate directly with the CLEC's

15   own operational support systems, or it's not designed to, is

16   that correct?

17   A   I can't say that it's not designed to. The type

18   of technology it uses makes that possible. So it's

19   something that can be done. That particular development

20   work hasn't been done because we don't have anybody who has

21   said they want to do it.

22   Q   So without further development work, LENS does not

23   interact directly with a CLEC's own operational support

24   systems without some human intervention, is that correct?

25   A   Well, sure. Anything that's going to be used to

1 to do on their side of the interface.

2 BY MR. LAMOUREAUX:

3   Q Well, I'll skip to this part of my cross now.

4 What's the date of that specification?

5   CHAIRMAN WISE: Repeat the question?

6 BY MR. LAMOUREAUX:

7   Q What's the date of that specification that you

8 just mentioned?

9   A I don't recall the exact date. There have been a

10 couple of different versions of it. I believe the most

11 current one was in the April or May time frame.

12   Q Naturally, you picked the one that I don't have a

13 lot of copies of.

14   Let me show you a document, if I may. And just

15 for the record's sake, on this -- the first page of this

16 document is a fax cover page to Jay Bradbury. The second

17 page, at the top says LENS access technical specification,

18 and it's dated at the bottom April 25th, 1997?

19   Okay. My only question is, is this the

20 specification you're referring to?

21   A Yes.

22   Q Since I don't have copies, I'm not actually going

23 to ask that this document be admitted into the record. I

24 just wanted to confirm that this was the document.

25   My question is, isn't it true that LENS has

1   changed substantially since that specification was released?

2   A   LENS has changed somewhat. I don't know if I can

3   agree with the characterization of substantially. But the

4   specification can be updated to reflect the changes in LENS.

5   Q   Has the specification been updated?

6   A   No, I don't believe so. As I said earlier, I

7   don't think that there's been -- there's been nobody who has

8   been asking us to undertake this development work.

9   Certainly if that development work were to be undertaken, we

10 would make sure that this document conformed with exactly

11 what is in LENS today.

12   This is intended to show that the capability is

13 available and that there is an accepted method for

14 developing a program that negotiates the movement of data

15 between a server, such as the LENS server, and an

16 independent computer application.

17   CHAIRMAN WISE: What would be the purpose of

18 updating and changing the specs anyway?

19   THE WITNESS: Well, there isn't any now because

20 with AT&T developing their customized interface with us and

21 with nobody else coming forward to say that they want to do

22 this, it would frankly be a waste of time right now to try

23 to keep this updated.

24   CHAIRMAN WISE: Were you responding to CLECs at

25 the time, or in this case AT&T --

1 gosh, at least 20 features. So I think it's a little

2 misleading to say that LENS can only order eight services.

3   VICE CHAIRMAN R. BAKER: Could you give an example

4 of what you mean by a service and then the additional

5 functions that go along with it?

6   THE WITNESS: Okay. Touchstar is a service

7 category. Behind Touchstar you have anonymous call

8 rejection, call blocking, call return, repeat dialing, and

9 you know, there's that whole list of services that are in

10 the Touchstar family.

11   Custom calling is a service family that can

12 ordered via LENS, but behind that you have call waiting and

13 speed dialing and call forwarding and that whole group of

14 services.

15 BY MR. LAMOUREAUX:

16   Q   Let's stick with the nomenclature of family of

17 services versus features that you'd get if you went into

18 that family and looked at what was there. There are over

19 100 families of services that BellSouth is capable of

20 providing, isn't that correct?

21   A   I believe the current list is 114, but not all of

22 those would be ordered or pre-ordered on an electronic basis

23 for BellSouth.

24   Q   In fact, through LENS you can only order the eight

25 family of services, you can't order any of the other 106, is

1   that correct?

2   A   Yes, that's correct. Again, EDI is the primary

3   pre -- excuse me, the primary ordering interface and there

4   are other services that can be ordered there.

5   Q   I wasn't asking about EDI, I was only asking about

6   LENS. In LENS you can only order the eight family of

7   services and you cannot order any of the other 106 family of

8   services?

9   A   Well, I think we said 114, but in any case, yes,

10 that's correct, but it's also -- you know, I just want to

11 make sure I clarify, that entire group of 114 can't be

12 ordered electronically or pre-ordered electronically by

13 BellSouth either. And that includes things like some of the

14 digital high-capacity services, or the multi-serve ESSX

15 kinds of services that we generally handle on a -- on a

16 paper. A pre-order, pre-service inquiry basis for our

17 retail customers, too.

18   VICE CHAIRMAN R. BAKER: And has any CLEC asked

19 that LENS be modified to add additional category of services

20 to the ordering function?

21   THE WITNESS: Not to my knowledge.

22   CHAIRMAN WISE: Is it feasible to do it if they

23 did ask?

24   THE WITNESS: Yes. We can continue adding

25 services and we anticipate that we would do that. At some

1 CLEC would order a service, it simply says hat the service

2 is available.

3   Q   And specifically it does not show which of those

4 services EDI or LENS are capable of ordering.

5   A   That's right, it says it's available.

6   Q   LENS cannot be used to change, modify or add new

7 features to existing service, can it?

8   A   LENS in the ordering mode can't be used to do

9 that. If you're talking pre-ordering; yes, you can look in

10 LENS to see what features, for example, a customer might

11 want to add.

12   Q   It cannot be used in the ordering mode to do that,

13 is that correct?

14   A   That's right, that would be done via EDI, that

15 capability is available in the industry-standard EDI

16 ordering interface.

17   Q   On page 25 of your testimony -- and I'll let you

18 catch up to me -- you refer to Exhibit GC-8 as the service

19 screen used by BellSouth's service representatives to check

20 on the availability of service, is that correct?

21   A   Well, technically I refer to it as "a" or "an"

22 actual services screen, not "the", there are many.

23   Q   Okay. And this is in RNS, correct?

24   A   Yes.

25   Q   Okay. So using RNS, a BellSouth service

1 representative can see which promotions BellSouth is

2 currently offering. And I'm looking at the third from the

3 bottom on the left-hand side.

4   A   Yes, that's one of the sales functions that's in

5 RNS.

6   Q   But although CLECs have the ability to resell

7 BellSouth's promotions, they cannot use LENS to check on the

8 availability of promotions, can they?

9   A   No, I don't believe they can. I'm not sure what

10 the method is for communicating that with CLECs. It seems

11 to me that during the arbitrations, we agreed on a method

12 for that, but I don't recall what that is. But again,

13 that's something that we consider to be a sales function and

14 the CLEC is free to use information in a way that lets it

15 support its sales efforts.

16   Q   But a CLEC cannot use LENS to obtain that same

17 pre-ordering information that a BellSouth representative has

18 access to, isn't that correct?

19   A   I guess I just don't agree that that's pre-

20 ordering information. It's not pre-ordering information in

21 the way that we've ever defined it in the arbitrations or in

22 -- or as it was defined in the FCC order. I consider that

23 sales information.

24   Q   You don't think it's important that CLECs, once

25 they're running, will need to know what promotions are